

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

FILED IN CLERK'S OFFICE
U.S.D.C. - Atlanta

DEC 31 2018

JAMES N. HATTEN, Clerk

By  Deputy Clerk

KEN JOSEPH

Plaintiff.

vs

**EXPERIAN INFORMATION
SOLUTIONS, INC.; TRANS UNION
LLC; EQUIFAX, INC.; EQUIFAX
INFORMATION SERVICES, LLC**

Defendants.

Civil Action No :

1:18-cv-3443-WMR-RGV

TRIAL BY JURY DEMANDED

PLAINTIFF'S MOTION FOR ENLARGEMENT OF TIME

PLAINTIFF, KEN JOSEPH ("PLAINTIFF"), proceeding *Pro Se*,
hereby files PLAINTIFF'S MOTION FOR ENLARGEMENT OF TIME TO
FILE RESPONSE TO DEFENDANTS' JOINT MOTION TO DISMISS
FIRST AMENDED COMPLAINT and states as follows:

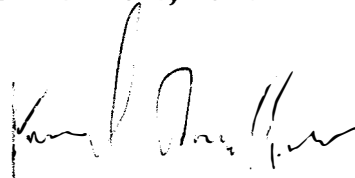
1. PLAINTIFF request that the court grant an additional twenty one (21) days to file responses.
2. PLAINTIFF is a *pro-se* and do not have a legal staff to help research case laws.

3. PLAINTIFF is not an attorney and did not study law and therefore need the additional time to properly respond to each of DEFENDANTS' motion.
4. PLAINTIFF is currently interviewing for a competent Attorney to represent him.
5. PLAINTIFF needs an additional time in order to properly respond to DEFENDANT because PLAINTIFF, who is proceeding *Pro-Se*, is not capable of crafting a response within the time prescribed in the Federal Rules of Civil Procedure in that the plaintiff skills are limited especially during the holiday season when he is also traveling to spend time with friends and families.
6. The Plaintiff's skills are limited because he is proceeding *Pro-Se*, and is not a trained attorney and therefore lacks the skills necessary in order to frame such a response within the prescribed limited time.
7. PLAINTIFF was anticipating defendants' motion earlier, however their response was late and ran into the holiday season.
8. The Federal Rules of Civil Procedures were created in order to manage litigation. Said rules, however, were intended to provide a reasonable time frame in which a trained professional, by the virtue of his or her training, was actually (humanly) capable of crafting.

9. PLANTIFF anticipates that he needs an additional 21 days in which to properly respond to the DEFENDANTS' joint Motions To Dismiss.

WHEREFORE, based upon the foregoing, PLAINTIFF, proceeding *Pro-Se*, hereby requests that this Court Grant him his MOTION FOR ENLARGEMENT OF TIME to file a response to DEFENDANTS' Joint Motion To Dismiss and Grant an extension of time in which to respond to the herein stated Plaintiff's Motions and such other and further relief as is deemed appropriate by this Court.

Respectfully submitted this 27th day of December, 2018.



Ken Joseph
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CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the document above will be sent by first class mail USPS to counsel of record listed below for Plaintiff.

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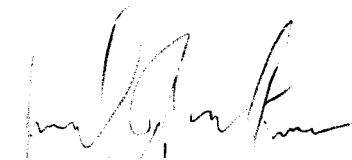
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Attorney for Defendant
Equifax Information Services, LLC and Equifax, Inc.

Dated: December 27th, 2018



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From Ken GOSP
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CERTIF



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GRAYSON, GA
30017
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AMOUNT

\$3.95

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To: United State District Court Clerk
75 Ted Turner DR NW Suite 2211
Atlanta Ga 30303 USA



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